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*Attorneys for Defendants Richard Spring,
The Spring Family Trust, and The Jeanne T. Spring Trust*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,
Debtor.

SIPA LIQUIDATION

Adv. Pro. No. 08-01789 (SMB)

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IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 09-01305 (SMB)

Plaintiff,

v.

COHMAD SECURITIES CORPORATION, *et al.*

Defendants.

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DECLARATION OF KENNETH W. LIPMAN

KENNETH W. LIPMAN, declares, pursuant to § 1746 of title 28 of the United States Code, as follows:

1. I am a member of Siegel, Lipman, Shepard, LLP, f/k/a Siegel, Lipman, Dunay, Shepard & Miskel, LLP (the “Firm”). I respectfully submit this declaration in support of the Firm’s motion, pursuant to Local Bankruptcy Rule 2090-1(e), to withdraw as co-counsel of record for Richard Spring, The Spring Family Trust, and The Jeanne T. Spring Trust (the “Spring Defendants”) in the above captioned adversary proceeding.

2. The Spring Defendants have retained two (2) law firms to represent them in this adversary proceeding: (i) the Firm, with offices located at 5355 Town Center Road, Suite 801, Boca Raton, Florida, and (ii) Katsky Korins LLP, with offices located at 605 Third Avenue, New York, New York.

3. On or about September 19, 2012, both law firms filed an Answer on behalf of the Spring Defendants, and since the inception of these proceedings, have monitored the proceedings in the Bankruptcy Court, the District Court, and the Court of Appeals for the Second Circuit, and, more recently, have engaged in discovery with Irving Picard, the Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC.

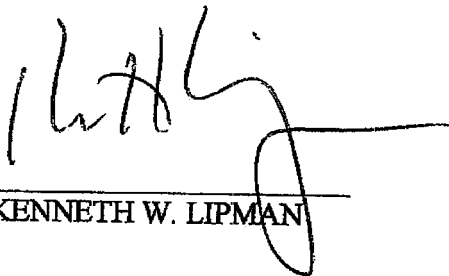
4. The Spring Defendants have thus far incurred significant costs of litigation while having limited resources available to them to defend this action. To reduce their litigation expenses, the Spring Defendants have requested that the Firm withdraw as co-counsel of record and that Katsky Korins LLP act as their sole counsel in this proceeding. While the Spring Defendants have expressed confidence and have repeatedly stated that they are pleased with the Firm’s representation of them, in light of the fact that the Firm is based in Florida while Katsky Korins LLP is based in New York where this adversary proceeding is venued, the Spring

Defendants believe that it is in their interests to be represented by New York counsel. Because the Spring Defendants will remain represented by Katsky Korins LLP, there is no prejudice to the Spring Defendants or any other party.

5. In light of the foregoing, I respectfully request that the Court grant the Firm's and my request to withdraw as co-counsel of record, and that the Firm's and my appearance on the docket (in this adversary proceeding and in the main case) be removed from ECF service.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: Boca Raton, Florida
July 10, 2014


KENNETH W. LIPMAN